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[Additional counsel listed on signature page]

16
17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **OAKLAND DIVISION**

20 CATHY O'BRIEN and LAURA ADNEY,
on behalf of themselves and all others
similarly situated,

21 Plaintiffs,
22 v.

23 POPSUGAR INC. and POPSUGAR MEDIA
24 INC.,

25 Defendants.

Case No. 4:18-cv-04405-HSG

26 **STIPULATION TO EXTEND DEADLINE**
27 **(LOCAL RULE 6-2)**

28 Date: November 8, 2018
Time: 2:00 p.m.
Courtroom: 2 – 4th Floor
Judge: Hon. Haywood S. Gilliam, Jr.
Action Removed: July 20, 2018

Plaintiffs Cathy O'Brien and Laura Adney, and Defendants POPSUGAR Inc. and POPSUGAR MEDIA Inc. hereby stipulate as follows:

WHEREAS, Plaintiffs filed a proposed class action, *O'Brien v. Popsugar Inc.*, on June 7, 2018 in the Superior Court for the County of Santa Clara, and Defendants removed this case to this Court on July 20, 2018;

WHEREAS, on July 26, 2018, the parties stipulated to extend Defendants' time to respond to Plaintiffs' complaint until October 10, 2018;

WHEREAS, on August 7, 2018, the Court related the *O'Brien* litigation to *Batra v. POPSUGAR Inc.*, No. 18-cv-03752, filed on June 25, 2018;

WHEREAS, on August 16, 2018, Plaintiffs filed a motion to remand this case to state court, and on August 30, 2018, Defendants filed their opposition to this motion;

WHEREAS, Plaintiffs' reply in support of their remand motion is currently set for September 6, 2018 and Plaintiffs' remand motion is currently set for hearing on November 8, 2018; and

WHEREAS, given the Labor Day holiday and deadlines in other cases, the parties have agreed to extend Plaintiffs' time to file their reply memorandum by 7 days, up to and including September 13, 2018.

THE PARTIES HEREBY STIPULATE AND AGREE, subject to the Court's approval,
that:

1. Plaintiffs' time to file their reply memorandum in support of their motion to remand is extended until September 13, 2018.

IT IS SO STIPULATED.

GIBBS LAW GROUP LLP

By: /s/ Michael L. Schrag

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17 DATED: September 6, 2018

18 **KEKER, VAN NEST & PETERS LLP**

19 By: /s/ Travis Silva

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DECLARATION OF MICHAEL L. SCHRAG

I, Michael L. Schrag, declare as follow:

1. I am a member in good standing of the California State Bar and a partner at the law firm of Gibbs Law Group LLP, counsel for Plaintiffs in this action. I made this declaration based on my personal knowledge, and if called to testify to the contents below, I would and would do so.

2. On August 17, 2018, Plaintiffs filed a motion to remand this case to state court. The motion is set for hearing on November 8, 2018.

3. Pursuant to Civil L.R. 7-3(c), Plaintiffs' reply in support of the motion is currently due on September 6, 2018.

4. The parties agree that due to the Labor Day holiday and counsel's schedule, an extension of Plaintiffs' reply deadline is appropriate. Specifically, the parties agree that Plaintiffs' time to file a reply in support of their motion should be extended by 7 days to September 13, 2018.

5. The only prior time modification in the case was a stipulation extending the deadline for Defendants to respond to the Complaint by seventy-five days. The requested time modification would not have any impact on the schedule for the case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct and this declaration was executed on the 5th day of September 2018 in Oakland, California.

By: /s/ Michael L. Schrag

ATTESTATION OF E-FILED SIGNATURE

I, Michael L. Schrag, am the ECF USER whose ID and password are being used to file the foregoing document. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that the other signatories listed above have concurred in this filing.

DATED: September 6, 2018

By: /s/ Michael L. Schrag

* * *

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 6, 2018

Haywood S. Gilliam, Jr.
HONORABLE HAYWOOD S. GILLIAM, JR.
United States District Court Judge